

August 5, 2014

RECEIVED
FEDERAL ELECTION
COMMISSION

2014 AUG -7 AM 10:55

OFFICE OF GENERAL
COUNSEL

Federal Election Commission
Office of Complaints Examination & Legal Administration
Attn: Kim Collins, Paralegal
999 E Street, NW
Washington, DC 20436

Re: MUR # 6853

Dear Ms. Collins:

We have received the complaint filed by Ralph Mann dated July 24th that was forwarded to me for our response. The complaint alleged that Weston Wamp has been on paid leave of absence while campaigning for federal office.

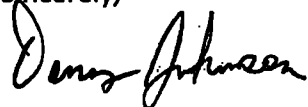
Weston Wamp has worked with Lamp Post Group for four years since he became a founding director with the company. Each director has different areas of responsibility and Mr. Wamp's is Director of Communications. Mr. Wamp is not on paid leave and continues to fulfill his responsibilities both in his office and remotely while outside of the office and/or out of town. He is able to utilize personal devices (i.e., cell phone, iPad and laptop) which are common tools of the trade in communication. This allows Mr. Wamp to continue to conduct business for his clients.

Lamp Post Group is a partnership, not a corporation. Allan Davis, an investment partner in Lamp Post Group, stated incorrectly in the local newspaper that Mr. Wamp was on paid leave when in truth, he continues to work from outside the office remotely. Jack Studer, the managing partner in Lamp Post Group, stated in the local newspaper that the partnership group does not even have a paid leave status and Weston Wamp works remotely and on a flexible schedule. This statement from Mr. Studer is attached to the complaint from an article in the Chattanooga Times Free Press.

Federal Disclosure Statement - Form B was originally filed electronically on May 14, 2014. The Earned Income in Schedule C was inadvertently reported incorrectly in the Current Year amount and the Amount in Preceding Year. The amounts reported were accidentally transposed in these two columns. An amended Form B has been filed electronically to correct this mistake. The Lamp Post Group salary was \$24,000 for the current year and \$67,203 for the preceding year.

If you need any additional information, please do not hesitate to contact me.

Sincerely,



Danny Johnson
Treasurer

enclosure



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JUL 24 2014

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COMMISSION

2014 AUG -7 AM 10: 56

OFFICE OF GENERAL
COUNSEL

Danny Johnson, II, Treasurer
Weston Wamp for Congress 2014
PO Box 11349
Chattanooga, TN 37401

RE: MUR 6853

Dear Mr. Johnson:

The Federal Election Commission received a complaint that indicates Weston Wamp for Congress 2014 and you in your official capacity as treasurer may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 6853. Please refer to this number in all future correspondence.

Under the Act you have the opportunity to demonstrate in writing that no action should be taken against Weston Wamp for Congress 2014 and you in your official capacity as treasurer in this matter. Please submit any factual or legal materials that you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission. Please note that you have a legal obligation to preserve all documents, records and materials relating to the subject matter of the complaint until such time as you are notified that the Commission has closed its file in this matter. See 18 U.S.C. § 1519.

Any correspondence sent to the Commission must be addressed as follows:

Mail

Federal Election Commission
Office of Complaints Examination
and Legal Administration
Attn: Kim Collins, Paralegal
999 E Street, NW
Washington, DC 20436

Email

kcollins@fec.gov

If you have any questions, please contact Kim Collins at (202) 694-1650 or toll free at 1-800-424-9530. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Jeff S. Jordan / JH

Jeff S. Jordan
Assistant General Counsel
Complaints Examination &
Legal Administration

Enclosures:

1. Complaint
2. Procedures
3. Designation of Counsel Statement

RECEIVED
FEDERAL ELECTION
COMMISSION

July 17, 2014

Acting General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

2014 JUL 18 PM 12: 58

OFFICE OF GENERAL
COUNSEL

Re: Weston Wamp and Weston Wamp for Congress

MUR # 6853

To Whom It May Concern:

Pursuant to 2 USC § 437g(a)(1) and 11 CFR § 111.4, please accept this letter as a Complaint against Weston Wamp and Weston Wamp for Congress ("the Committee") for operating in violation of the Federal Election Campaign Act of 1971, as amended (the "Act"), and Federal Election Commission ("FEC" or "Commission") regulations, as described below.

Facts

I am a constituent in the 3rd Congressional District of Tennessee. While reading a newspaper article in the Chattanooga Times Free Press (enclosed), I learned that Weston Wamp has been on a paid leave of absence while campaigning in my district. I then looked up the campaign financial disclosure (also enclosed) filed by the Committee and discovered that he was paid \$24,000 while actively employed by the Lamp Post Group in 2013, but his reported income as of May for the year 2014 was \$67,203.

My concern is that Weston Wamp is being paid to run for Congress and that he is receiving political contributions that are not reported as such.

Conclusion

Upon information and belief, and based upon the facts relayed herein, Weston Wamp and Weston Wamp for Congress have violated the Federal Election Campaign Act of 1971, as amended, and Federal Election Commission Regulations. Accordingly, I respectfully request that the Commission conduct an immediate investigation into the violations outlined above and impose the maximum penalty under law.

The foregoing is correct and accurate to the best of my knowledge, information and belief.

Respectfully submitted,

KELIA M. JAMES

SIGNAL MTN, TN 37377

Sworn to and subscribed before me this 17th day of July, 2014.



Notary Public

My Commission Expires: 11/13/16



11/13/16



Filing ID #10002035

FINANCIAL DISCLOSURE REPORT

Clerk of the House of Representatives • Legislative Resource Center • B-106 Cannon Building • Washington, DC 20515

FILER INFORMATION

Name: Thomas Weston Wamp
Status: Congressional Candidate
State/District: TN03

FILING INFORMATION

Filing Type: Candidate Report
Filing Year: 2014
Filing Date: 05/14/2014

SCHEDULE A: ASSETS AND "UNEARNED" INCOME

| Asset | Owner | Value of Asset | Income Type(s) | Income Current Year to Filing | Income Preceding Year |
|----------------------|-------|----------------------|----------------|-------------------------------|-----------------------|
| First Tennessee Bank | | \$50,001 - \$100,000 | Interest | \$1 - \$200 | \$1 - \$200 |

Wamp Strategy, LLC \$1,001 - \$15,000 None

LOCATION: Chattanooga/Hamilton, TN, US

DESCRIPTION: Participant in Wamp Strategy, LLC, a limited liability corporation.

SCHEDULE C: EARNED INCOME

| Source | Type | Amount Current Year to Filing | Amount Preceding Year |
|-----------------|--------|-------------------------------|-----------------------|
| Lamp Post Group | Salary | \$67,203 | \$24,000 |

SCHEDULE D: LIABILITIES

None disclosed

SCHEDULE E: POSITIONS

Wamp's work status prompts questions

BY JEFFREY B. BUCKNER

BY JEFFREY B. BUCKNER

It's not clear if Wamp is on paid leave or if he's working remotely. The company doesn't offer paid leave, and that his colleague misspoke. He said Wamp is working remotely.



INSIDE

report \$3.45 million in contributions. B4

also even be an illegal contribution, he said, because corporations can't make political donations to candidates.

But another partner at the business incubator said Tuesday the company doesn't offer paid leave, and that his colleague misspoke. He said Wamp is working remotely.

Wamp is challenging U.S. Rep. Chuck Fleischmann in the Aug. 7 Republican primary. The winner will face Democratic candidate Mary Hearn in November.

IFEC rules say a candidate's normal salary or wages are considered personal funds and aren't directly tied to the campaign.

However, compensation paid to a candidate in excess of actual hours worked is generally considered a contribution from the employer, according to IFEC rules. If a complaint was filed and found valid, he could have to repay the money.

On July 23, after announcing a \$300,000 personal contribution to the Character Counts PAC to help Wamp's campaign, Lamp Post founder Allan Davis said Wamp had been on paid leave since he

See WAMP, Page A8

Wamp

Continued from A1

Lamp Post partner, said Davis was mistaken.

"We don't have a paid leave status — he's not in it. If there is one, I want to get in. It sounds like a pretty sweet deal," Studer said. "Allan is obviously one of our founders and does great work here, but he's not a detail guy."

Studer said Wamp has been working for the company, just not at the office or during traditional work hours.

As communication director Wamp works with

said.

"He continues to work with other companies who need him. But he's working more remotely. His schedule has obviously flexed a lot to make up for that workload," Studer said. "If he doesn't need to sleep and can run a campaign at the same time, more power to him."

Wamp, who was campaigning in Campbell County on Tuesday, also said he's been hard at work.

"For the six-and-a-half months I've been campaigning, I've been active at Lamp Post. I've been working remotely, I've been in and out of the office," Wamp said. "Obvi-

day operations and was probably not aware Wamp was working on the road.

Wamp and Davis are prohibited from interacting, since Davis has donated to a political action committee to help Wamp get elected.

Studer said Lamp Post has been careful about that.

"Obviously when Allan told us he was going to be doing the Character Counts thing ... we also needed to put some walls up between he and Weston," Studer said.

Neither Wamp, nor Fleischmann had filed second-quarter federal campaign finance by press time Tuesday. The filing dead-